GIBBONS

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February 24, 2023

VIA ECF

Honorable Jessica S. Allen, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

> **Re:**   ***Krishanthi, et al. v. Rajaratnam, et al.*, Dkt. No. 09-cv-05395(BRM)(JSA)**

Dear Judge Allen:

This firm, along with Perry Guha LLP, represents Defendants Raj Rajaratnam and the Estate of Jesuthasam M. Rajaratnam in the above-captioned matter. We write jointly with counsel for Plaintiffs to seek a one-week extension of the deadline set forth in the Court's February 10, 2023 text order. ECF No. 534. The parties and counsel for the confidential witness and the former JTTF agents have engaged in a productive meet and confer with subsequent discussions via email, including as recently as today. In light of the progress that has been made, and in an effort to reach complete agreement and avoid the need to expend further judicial resources, we respectfully request that the parties be given until March 3, 2023 to present to Special Master Dickson any unresolved discovery dispute related to the sealing of documents filed in connection with the pending appeal.

If this is acceptable to the Court, we respectfully request that Your Honor "So-Order" this letter in the space provided below and direct its entry on the docket at the Court's convenience. Of course, if Your Honor has any questions or concerns, please do not hesitate to contact me. Thank you very much for your kind consideration of this matter.

Respectfully submitted,

s/Anne M. Collart

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SO ORDERED:
This _____ day of February, 2023

_____
Honorable Jessica S. Allen
United States Magistrate Judge

cc: All Counsel of Record (*via ECF*)